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10 Attorneys for Seterus, Inc.

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

10 CALVIN M. FAULEY,

Case No.: 2:17-cv-02962-RFB-VCF

11 Plaintiff,

12 vs.

13 SETERUS, INC.,

14 Defendants.

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**STIPULATION AND ORDER TO  
EXTEND ALL DISCOVERY  
DEADLINES SIXTY (60) DAYS**

**(Second Request to Extend Discovery  
Deadlines)**

IT IS HEREBY STIPULATED between Plaintiff Calvin M. Fauley (“Fauley” or “Plaintiff”), by and through his attorneys of record, David H. Krieger, Esq. of the law firm Haines & Krieger, LLC, and Defendant Seterus, Inc. (“Seterus”), by and through its attorneys of record, Dana Jonathon Nitz, Esq. and Natalie C. Lehman, Esq. of the law firm Wright, Finlay & Zak, LLP, in order to facilitate depositions and in furtherance of on-going settlement negotiation, the parties request that all discovery deadlines be continued out by sixty (60) days as follows:

Deadline	Current	Requested
Discovery Cut-Off	8/13/18	10/12/18
Initial Expert Disclosures	6/14/18	8/13/18 (60 days prior to close of discovery)
Rebuttal Expert Disclosures	7/16/18	9/14/18 (30 days after initial expert disclosure)
Dispositive Motions	9/12/18	11/12/18 (31 days after close of discovery).

1	Interim Status Report	6/14/18	8/13/18 (60 days prior to close of discovery)
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2 Joint Pretrial Order due December 12, 2018. If dispositive motions are filed, the deadline for filing the joint  
3 pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

4 No request is being made to the deadline to amend pleadings or add parties.

5 This request is in compliance with LR 26-4 in that it is being made within 21 days prior  
6 to the discovery cut-off deadline. This is the parties' second request for an extension of discovery  
7 deadlines and is not intended to cause any delay or prejudice to any party.

8 IT IS SO STIPULATED.

9 DATED this 21st day of May, 2018.

10 DATED this 21st day of May, 2018.

11 **HAINES & KRIEGER, LLC**

12 /s/ David H. Krieger  
13 David H. Krieger, Esq. (NV Bar 9086)  
14 8985 S. Eastern Ave., Suite 350  
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18 Attorneys for Plaintiff, *Calvin M. Fauley*

19 **WRIGHT, FINLAY & ZAK, LLP**

20 /s/ Natalie C. Lehman, Esq.  
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25 Phone: (702) 475-7964  
26 Fax: (702) 946-1345  
27 Attorneys for Defendant, *Seterus, Inc.*

28 **ORDER**

18 IT IS SO ORDERED.

19 Dated this 21st day of May, 2018.



20 UNITED STATES MAGISTRATE JUDGE

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23 Respectfully submitted by:

24 **WRIGHT, FINLAY & ZAK, LLP**

25 /s/ Natalie C. Lehman, Esq.  
26 Natalie C. Lehman, Esq. (NV Bar 12995)  
27 Attorneys for Defendant, *Seterus, Inc.*